

**Federal Defenders
OF NEW YORK, INC.**

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March 10, 2023

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**RE: United States v. Burgos-Hernandez et al.
22 Cr. 133 (JGK)**

Dear Judge Koeltl:

I write on behalf of my client, Franklin Bello Jimenez, in the above-captioned matter, to respectfully request that the Court modify Mr. Bello Jimenez's bail conditions to allow him to travel to the Dominican Republic to attend his father's funeral this month. The government objects to this request. Pretrial services takes no position.

On February 17, 2022, Magistrate Judge Gabriel W. Gorenstein released Mr. Bello Jimenez on his own signature and imposed the following bail conditions: a \$25,000 personal recognizance bond cosigned by two financially responsible persons; travel limited to the SDNY/EDNY; surrender all travel documents with no new applications; pretrial supervision as directed by pretrial services; maintain or seek employment; no contact with co-defendants except in the presence of counsel; no new loans or lines of credit without prior approval from pretrial services. Mr. Bello Jimenez's bail conditions were timely satisfied.

For the past 13 months, Mr. Bello Jimenez has remained compliant with the conditions of release, including recently completing his presentence interview in anticipation of sentencing, currently set for July. The Court has previously granted Mr. Bello Jimenez a temporary bail modification to travel to visit his mother on August 14, 2022 and October 15, 2022, and to travel to spend the holidays with family in Boston, MA.

Mr. Bello Jimenez now requests permission to travel to the Dominican Republic on March 15, 2023 to attend his father's wake and burial. Mr. Bello Jimenez's father passed away on March 7, 2023 after losing a battle to leukemia. He was 76 years old. Mr. Bello Jimenez would greatly appreciate the opportunity to formally say goodbye to his father, surrounded by family and loved ones. He has already purchased a ticket to fly to the Dominican Republic, as well as a return ticket to New York, where he resides with his wife and two young children.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:

THE HONORABLE JOHN G. KOELTL
United States District Judge

cc: Sarah Kushner, Assistant U.S. Attorney

Permission to travel to the Dominican Republic granted conditioned on the defendant's providing a detailed itinerary to the Probation Department and any other reasonable condition imposed by the Probation Department.

March 10, 2023
New York, NY

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.